

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**Dallas Division**

ROBERT HOPKINS, III,

Plaintiff,

v.

DEPARTMENT OF DEFENSE,

Defendant.

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Civil Action No. 3:22-cv-00706 (E)

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**PLAINTIFF’S CONSENT MOTION FOR ENLARGEMENT OF TIME  
WITHIN WHICH TO FILE REPLY IN SUPPORT OF HIS MOTION TO  
AUTHORIZE HIS COUNSEL TO ACCESS HIS INTENDED EVIDENCE**

Plaintiff Robert Hopkins, III (“Hopkins”) commenced this litigation against the Department of Defense (“DOD”) in March 2022 to challenge the unconstitutional prior restraint imposed upon him with respect to manuscripts that he properly submitted for prepublication review between December 2020 and January 2022. On 12 February 2024, Hopkins filed a motion asking the Court to authorize his undersigned counsel to access a specific piece of evidence that he intends to file in opposition to DOD’s dispositive motion. Hopkins now respectfully requests that his deadline for filing his reply to this motion be extended by 1 week until 25 March 2024. This filing is currently due 18 March 2024.

Hopkins has good cause to request this relief. On 21 February, the Department of Justice informed the undersigned that it had scheduled an administrative hearing regarding another client's security clearance appeal for 18 March. The undersigned will need to spend a significant amount of time preparing his client for this hearing, as well as participating in the actual hearing itself, and will not be able to dedicate sufficient time to this brief as it warrants. Because this hearing was scheduled after the briefing of Hopkins's motion for access had commenced and was beyond the undersigned's control, the undersigned's need to devote time and resources to it at the expense of this filing constitutes good cause for an enlargement of this deadline, especially for such a short period of time.

DOD consents to this Motion. A proposed Order has been included with this Motion.

Date: March 12, 2024

Respectfully submitted,

/s/ Kelly B. McClanahan  
Kelly B. McClanahan, Esq.  
N.D. Tex. Bar #984704DC  
National Security Counselors  
4702 Levada Terrace  
Rockville, MD 20853  
301-728-5908  
240-681-2189 fax  
[Kel@NationalSecurityLaw.org](mailto:Kel@NationalSecurityLaw.org)

*Counsel for Plaintiff*